

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ANTHONY BLACKSHIRE

§

Plaintiff,
vs.

CIVIL ACTION NO. 2:09-cv-329

TYSON FOODS, INC.

§

Defendant.

PLAINTIFF'S TRIAL WITNESS LIST

Plaintiff hereby files the following Trial Witness List in accordance with the Federal Rules of Civil Procedure and this court's docket control order. Plaintiff may call any of the following individuals during trial in this matter. Plaintiff reserves the right to call anyone listed on Defendant's Witness List.

Anthony Blackshire
c/o Michael Pierce and Gabe Vick
Arnold & Itkin, LLP

Plaintiff will testify regarding the injuries caused by this incident, his pain, suffering, mental anguish, and economic damages.

A corporate representative of Defendant Tyson Foods, Inc.

Darren Mulford
c/o Brian J. Fisher and Zach T. Mayer
Kane Russell Coleman & Logan PC

A representative of Defendant Tyson Foods, Inc. or Mr. Mulford may testify regarding Defendant's policies, procedures, and Defendant's investigation of the incident.

Patricia Williams
Tyson Foods, Inc.
c/o Brian J. Fisher and Zach T. Mayer
Kane Russell Coleman & Logan PC

Ms. Williams may testify regarding Defendant's policies, procedures, and Defendant's investigation of the incident.

John Dean Edmond

Mr. Edmond may testify regarding his knowledge of the incident made the basis of this suit.

Jessica Rasberry, RN, COHN

And Custodian of Records

C/o Kane Russell Coleman & Logan, PC

Ms. Rasberry is the Nurse Manager at Defendant's Carthage facility. She may testify regarding Plaintiff's injuries, his medical treatment, and the termination of benefits to Plaintiff pursuant to Tyson's Workplace Injury Settlement Program.

Plaintiff's retained experts:

Kenneth G. McCoin, Ph.D, CFA

Dr. McCoin is Plaintiff's retained economist expert and will testify regarding Plaintiff's economic damages.

William L. Quintanilla, M.Ed., L.P.C.

Rehabilitation Resources, Inc.

Mr. Quintanilla is Plaintiff's retained vocational rehabilitation expert and will testify regarding the ways in which Plaintiff's future employability may be affected by this incident.

Jack Madeley, P.E., CSP

Madeley Safety Engineering Consultants

Mr. Madeley is Plaintiff's retained liability expert and will testify regarding Defendant's negligence and how this negligence caused Plaintiff's injury.

Defendant's retained experts

Plaintiff's medical providers may testify regarding Plaintiff's related medical treatment, medical expenses, and prognosis.

Dr. Kenneth Lee
And Custodian of Records
Modern Spine

Jessica Rasberry, RN, COHN

And Custodian of Records

C/o Kane Russell Coleman & Logan, PC

Dr. Eubulus J. Kerr
Stephen Kay, PA-C
And Custodian of Records
Spine Institute of Louisiana

Dr. Clayton H. Brakeville
And Custodian of Records
Carthage Physical Therapy

Dr. Vera Luther
Dr. Vidyasagar Reddy
Dr. Ramandham Kilaru
Dr. John F. Nielsen
And Custodian of Records
East Texas Medical Center – Carthage

Dr. Lorenzo Farolan
Dr. Omar D. Vidal
And Custodian of Records
Memorial MRI & Diagnostics

Dr. John F. Nielsen
Panola Physician Center

Dr. Kyle Campbell

A representative and Custodian of Records
Program Administrators, LLC

This entity and associated individuals may testify regarding Tyson's Workplace Injury Settlement Program as well as Plaintiff's alleged violations of that Program which resulted in the denial of additional benefits to Plaintiff.

Respectfully submitted,

ARNOLD & ITKIN LLP

/s/ Michael E. Pierce

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on May 11, 2010, a copy of the foregoing document was served upon the following counsel of record in compliance with Federal Rules of Civil Procedure:

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Counsel for Defendant Tyson Foods, Inc.

/s/ *Michael E. Pierce*

Michael E. Pierce